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11 *Attorneys for the Ad Hoc Committee of*
Holders of Trade Claims

12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 **In re:**

16 **PG&E CORPORATION**

17 **-and-**

18 **PACIFIC GAS AND ELECTRIC**
COMPANY,

Debtors.

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric
Company
21 ☒ Affects both Debtors

22 ** All papers shall be filed in the Lead*
23 *Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

NOTICE OF MOTION OF AD HOC
COMMITTEE OF HOLDERS OF TRADE
CLAIMS FOR LEAVE TO APPEAL
ORDER REGARDING POSTPETITION
INTEREST

Date: TBD

Time: TBD

Judge: TBD

Objection Deadline: March 5, 2020

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas
2 and Electric Company, as debtors and debtors in possession (collectively, the “Debtors”), in the
3 above-captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title
4 11 of the United States Code with the United States Bankruptcy Court for the Northern District of
5 California (San Francisco Division) (the “Bankruptcy Court”).

6 **PLEASE TAKE FURTHER NOTICE** that, pursuant to 28 U.S.C. § 158(a)(3) and
7 Federal Rule of Bankruptcy Procedure 8004, the Ad Hoc Committee of Holders of Trade Claims
8 (the “Trade Committee”) has filed the *Motion of the Ad Hoc Committee of Holders of Trade Claims*
9 *for Leave to Appeal Order Regarding Postpetition Interest* (the “Motion”). The Motion
10 accompanies the Trade Committee’s *Notice of Appeal and Statement of Election to Have Appeal*
11 *Heard by District Court* (the “Notice of Appeal”) and is supported by the *Memorandum in Support*
12 *of Motion of the Ad Hoc Committee of Holders of Trade Claims for Leave to Appeal Order*
13 *Regarding Postpetition Interest*, this notice of the Motion, and all the papers and record on file in
14 this action.

15 **PLEASE TAKE FURTHER NOTICE** that the Motion may be heard by the United States
16 District Court of the Northern District of California (the “District Court”) at a date and time to be
17 set by the District Court. Pursuant to Federal Rule of Bankruptcy Procedure 8004(c)(3), however,
18 any relief requested in the Motion may be granted without a hearing.

19 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Federal Bankruptcy Rule of
20 Procedure 8004(b)(2), any oppositions or responses to the Motion must be in writing, filed with
21 the District Court, and served on counsel for the Trade Committee so as to be received by no later
22 than **March 5, 2020**. Any oppositions or responses must also be filed and served on all the parties
23 reflected in the Notice of Appeal.

24 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting
25 papers can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at
26 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
27 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime
28 Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
U.S.-based parties; or +1 (929) 333-8977 for international parties or by email at:
pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
Bankruptcy Court’s website.

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Dated: February 20, 2020

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Michael S. Neumeister
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